

### REMARKS

The Examiner is thanked for the Office Action of February 8, 2008. This request for reconsideration is intended to be fully responsive thereto.

### AMENDMENTS

The claim 16 was amended to clarify the meanings of the claim. All changes are fully supported by the paragraphs [0070], [0211], and [0274]. Claims 18, 19, 21, and 23-26 was amended to comply with the Examiner's rejection under 35 USC 112 and objection in the Office Action. Claim 21 was also amended to clarify the meanings of the claim. All changes are fully supported by the paragraphs [0071], [0289], [0290], and [0291]. Claim 22 was also amended to clarify the meanings of the claim. All changes are fully supported by the paragraph [0427]. Claim 26 was amended to clarify the meanings of the claim. All changes are fully supported by the paragraphs [0075], [0294], [0295], [0296], and [0297]. Claims 20, and 27-30 were canceled. No new matter has been added.

### CLAIM OBJECTIONS

Claim 19 was objected because of the informalities in line 3. The Applicant amended claim 19 to replace "fore and aft record" with "before and after". The Applicant also amended claim 25 to replace "fore and aft record" with "before and after". No new matter has been added.

### REJECTIONS UNDER 35 U.S.C. 112

The Examiner rejected claims 18-21, 23-26, and 28-30 under 35 U.S.C. 112, 6<sup>th</sup> paragraph because of “means or step plus function” limitations in these claims. The Applicant deleted “means or step plus function” and amended these claims in method claim formats. The Applicant simply replaced the functional portions of these claims to convert into proper steps. Therefore, no “means or step plus function” language exists in any currently pending claims. No new matter has been added.

### REJECTIONS UNDER 35 U.S.C. 102 (b)

The Examiner rejected claims 1-30 were rejected under 35 U.S.C. 102 (e) as being anticipated by US Patent Application Publication No. 2003/0074600 to Tamatsu. The Examiner rejected claims 16-24 and 26-30 basically suggesting that Tamatsu discloses every elements of the rejected claims. The Applicant respectfully disagrees.

Tamatsu is another application by the Applicant of the present invention and is totally different from the present invention in the structures, objects, and functions. Tamatsu is basically an invention for data backup and recovery system. Claim 1 of Tamatsu states:

Claim 1.

- A data backup and recovery system for computers, comprising:
  - blocks storing sequentially records containing a single unique key and zero or one or more non-unique keys;
  - a primary system that controls the location of these blocks by

means of a location table pairing the blocks with physical addresses in random access memory and manages a database or databases stored in random access memory; and

- a secondary system or systems that is provided with backup blocks corresponding to the blocks of the said primary system in which the source data is stored, controls the location of these blocks by means of a location table pairing the blocks with physical addresses in random access memory, and manages a database or databases stored in random access memory, wherein

said primary system transmits to the secondary system or systems the content of updated data and information, specifying the blocks where updated content, data and pre-updated information is stored, said secondary system or systems are provided with a synchronous tightly-coupled or an asynchronous loosely-coupled sequencing system arranged to receive transaction initiation information from said primary system and then receive log completion information to said primary system after receiving transaction completion information from the primary system until that backup update processing is complete, and when a transaction is canceled or suffers abnormal termination and the primary system receives a message that the transaction has been canceled, the primary system transmits to the secondary system or systems said

message, and the secondary systems restore all affected data back to the state prior to the updates on the basis of the pre-updated information.

Significant elements of Tamatsu are the primary system and the secondary system. The primary system is a system to actually drive the database system while the secondary system is to obtain the backup of the primary system. However, the present invention relates to the database reorganizing system and database and the object thereof is to reorganize the database system. In the present invention, in order to perform reorganization, the primary system only (not secondary system) is utilized which is obvious as no secondary system is mentioned in the current claims. The Examiner may see the secondary system in the current specification; however, it is to explain that the present invention can run the reorganization without any problem even if the data backup/recovery system of Tamatsu is being used.

The Examiner suggested the paragraphs [0118], [0124], [0126], [0127], [0129], [0130], [0131], [0133], [0135], [0137], [0141], and [0144] of Tamatsu to reject claims of the present invention; however, most importantly, Claim 16 was amended to read as follows:

Currently Amended Claim 16:

A database reorganization system, comprising  
data records for holding data entries, each data record contain a  
primary key;  
primary blocks for storing data records in the order of the

primary keys thereof;

overflow blocks linked to the primary blocks;

a current location table and a new location table for containing in contiguous regions entries describing the addresses of the primary blocks;

a current location table reorganization pointer that indicates through which entry in the current location tables reorganization has completed;

a new location table reorganization pointer that indicates through which entry in the new location table reorganization has completed; and

a current location table final pointer that indicates the final position used by that location table.

None of currently amended limitations of claim 16 are present, suggested, or taught in Tamatsu. Therefore, the rejections under 35 USC 102 should be withdrawn. If you review the languages of claims in Tamatsu, all the pending claims in the present invention are not related to Tamtsu at all.

### Conclusion

Because of the above-identified and fully discussed differences, it is respectfully submitted Claims 16-19 and 21-26 are now in condition for allowance and notice to that effect is respectfully requested.

Should the Examiner believe further discussion regarding the above claim language would expedite prosecution they are invited to contact the undersigned at the number listed below.

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